

REMARKS

Claims 1-37 are pending in the present application, of which Claims 1, 19 and 37 are the independent claims. Claims 1, 2, 4-8, 11-20, 22, 26, 29 and 30-37 are amended. The amendments are supported by the application, including the claims, as originally filed, and including without limitation ¶¶ 21-23, 24-34, 35-46 and 47-53, and Figures 1, 2B, 3 and 4. Reconsideration and reexamination are respectfully requested.

The Applicant wishes to thank the Examiner for the kind courtesies extended during the October 28, 2010 personal interview. During the interview, the Applicant's undersigned representative provided an overview discussion of embodiments of the present application and discussed differences between the applied art and the claimed subject matter. In accordance with the discussion during the interview, the claims are amended to even more clearly recite that user interactions across multiple web pages are tracked, and an item from each user interaction is identified by an item identifier in a database that stores information about the user interaction as a user event, each user interaction's user event is at least in part defined by one or more user event parameters, including the item identifier. The claims are further amended to recite that the user interactions with the multiple web pages are analyzed using the item identifier from the user interactions' user events in the database to formulate at least one correlation between at least two user interactions, such that recommendations are generated in accordance with the at least one correlation between the at least two user interactions. During the interview, it was agreed with the Examiner that the amendments presented herein would be based on the claims as they appeared prior to filing the Request For Continued Examination on August 18, 2010. The following remarks supplement the remarks made in the August 18, 2010 paper, and are made in view of the discussion during the interview and the rejections made in the May 20, 2010 Office Action.

In the May 20, 2010 Office Action, claims 1, 2, 13-15, 19, 20, 31-33 and 37 were rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 6,236,978 (Tuzhilin).

By way of some background and without limitation, in accordance with at least one embodiment, one or more users 104 may interact with web pages provided by web sites, and an

item from each of the user interactions can be identified, e.g., by an item identifier, the items identifiers from the user interactions can be used to make correlations between user interactions, and the correlations used to make a recommendation. By way of a non-limiting example, a user may view a news article about skateboarding at a news web site and shop for skateboards at a shopping web site. The information about these user interactions can be retained, including the item identifiers that identify the news article about skateboarding that the user read at the news web site and the skateboard(s) at the shopping web site. The items from these user interactions can be correlated, e.g., both are related to skateboarding, and the correlation can be used to recommend another item related to skateboarding, e.g., a skateboarding movie.

Claim 1 recites, *inter alia*, tracking user interactions across multiple web pages and identifying an item from each user interaction with a web page of the multiple web pages, information about each user interaction is stored in a database as a user event, and each user interaction's user event is at least in part defined by one or more user event parameters including an item identifier identifying the item from the user interaction, receiving a triggering event for a recommendation, analyzing the user interactions using the item identifier from the user events in the database to formulate at least one correlation between at least two user interactions, and generating recommendations in accordance with the at least one correlation between the at least two user interactions. The Applicant submits that Tuzhilin at least fails to disclose at least these elements of amended claim 1.

Tuzhilin focuses on compressing similar rules into a smaller number of aggregated rules that can be used with a personal shopping assistant and a personal intelligent digital assistant; an aggregated rule is generated by compressing an individual user's rules into one or more aggregated rules, which are then reviewed for selection by a human expert, and only the individual rules that correspond to the aggregated rules selected by the human expert are retained for the individual user. (See Tuzhilin, abstract and col. 2, lines 23-40.) At col. 11, lines 21-29, Tuzhilin describes that a user profile may include a purchasing decision, i.e., the user bought a particular automobile in a particular month and a rule, i.e., "if user Y visits a web site from the site Z in the evening, user Y does not spend a predetermined amount of time at site Z," nothing in Tuzhilin, including Tuzhilin's user profile, corresponds to the claimed database that stores

information about each user interaction, including an item identifier identifying the item from the user interaction. Additionally and while Tuzhilin describes data from "credit card transactions, airline reservations and Web site visit transactions," Tuzhilin fails to disclose tracking user interactions across multiple web pages and identifying an item from each user interaction; and Tuzhilin further fails to disclose storing information about each user interaction in a database as a user event, including an item identifier identifying the item from the user interaction. Tuzhilin further fails to disclose analyzing the user interactions using the item identifier from the user events in the database to formulate at least one correlation between at least two user interactions, and further fails to disclose generating the recommendations in accordance with the at least one correlation between the at least two user interactions.

In further contrast to the claimed subject matter, Tuzhilin describes compressing only individual rules that are "similar" into aggregated rules and using rules retained for the user to generate recommendations. Specifically, Tuzhilin states "system[s] and method[s] according to the present invention facilitate[] compressing individual rules into 'aggregated' rules." (Tuzhilin, col. 4, lines 59-61.) "[S]everal of the individual rules that are similar (generally pertaining to different users) can be compressed into one aggregated rule pertaining to the same subject matter that can be applicable to several users." (*id.*, col. 5, lines 32-36.) (Emphasis added.) Tuzhilin discloses that "similar rules should have the same number of terms, the same fields C_{ij} ... , " where " $C_1, C_2, \dots C_n$ identify a particular transaction (e.g., date of transaction, time of transaction, amount spent, location of the transaction, etc.)." (Tuzhilin, col. 6, lines 1-2 and col. 4, lines 7-9.) Tuzhilin is silent with respect to tracking user interactions across multiple web pages and identifying an item from each user interaction with a web page of the multiple web pages, and storing information that includes an item identifier from each user interaction in a database, which information is analyzed to formulate at least one correlation between at least two of the user interactions, as is presently recited in claim 1.

As such, Applicants submit that Tuzhilin fails to disclose at least the elements of tracking user interactions across multiple web pages and identifying an item from each user interaction with a web page of the multiple web pages, information about each user interaction is stored in a database as a user event, and each user interaction's user event is at least in part defined by one

or more user event parameters including an item identifier identifying the item from the user interaction, receiving a triggering event for a recommendation, analyzing the user interactions using the item identifier from the user events in the database to formulate at least one correlation between at least two user interactions, and generating recommendations in accordance with the at least one correlation between the at least two user interactions, as is presently recited in claim 1.

Claims 19 and 37 are amended to include features similar to claim 1, and are allowable over Tuzhilin for at least similar reasons. Accordingly, Applicants request the rejections for claims 1, 19 and 37 (and all claims depending there from) be withdrawn and the claims allowed.

Claims 3-12, 16-18, 21-30 and 34-36 are rejected under U.S.C. § 103(a) over Tuzhilin in view of U.S. PGPub. No. 2002/0010625 (Smith). Claims 3-12, 16-18, 21-30 and 34-36 depend from claims 1, 19 and 37, which are allowable over Tuzhilin for at least the reasons stated above. Smith fails to cure the identified deficiencies of Tuzhilin, nor is it alleged to. As such, claims 3-12, 16-18, 21-30 and 34-36 are allowable for at least depending on an allowable independent claim. Accordingly, Applicant requests the rejections be withdrawn and the claims allowed.

In view of the foregoing, the entire application is believed to be in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

Should matters remain which the Examiner believes could be resolved in a telephone interview, the Examiner is requested to telephone the Applicant's undersigned attorney. Alternatively, since it is believed that the claims of the present application are in condition for allowance, the Examiner is respectfully requested to issue a Notice of Allowance at the Examiner's earliest convenience.

The Applicant's attorney may be reached by telephone at 212-801-6729. All correspondence should continue to be directed to the address given below, which is the address associated with Customer Number 76058.

The Commissioner is hereby authorized to charge any required fee in connection with the submission of this paper, any additional fees which may be required, now or in the future, or credit any overpayment to Account No. 50-1561. Please ensure that the Attorney Docket Number is referenced when charging any payments or credits for this case.

Respectfully submitted,

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